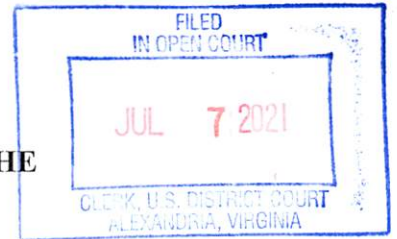


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

MOULUAN WU,

Defendant.

UNDER SEAL

Case No. 1:21-cr-135-RDA

STATEMENT OF FACTS

The United States and the defendant, MOULUAN WU, agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. From on or about June 6, 2020 to on or about March 26, 2021, in the Eastern District of Virginia and elsewhere, Defendant MOULUAN WU knowingly and intentionally conspired and agreed with Unindicted Coconspirator-1 and others to commit wire fraud by knowingly devising and intending to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representation, and promises; and transmitting and causing to be transmitted interstate wire communications in furtherance of the conspiracy, contrary to Title 18, United States Code, Section 1343 and in violation of Title 18, United States Code, Section 1349.

2. It was the object of the conspiracy for Defendant and his coconspirators to use wire communications to defraud victims of their money and property by means of materially false or fraudulent pretenses, representations, and promises.

3. To achieve the object of the conspiracy, Defendant and his coconspirators engaged in the following conduct in the Eastern District of Virginia and elsewhere:

- a. Conspirators contacted victims by telephone or through their computers.
- b. Conspirators assumed fictitious identities and made materially false and fraudulent representations and promises to induce their victims to purchase gift cards, including gift cards to be redeemed at Walmart stores.
- c. Conspirators then directed the victims to send to members of the conspiracy through wire communications the gift cards' redemption codes, which are codes used to redeem the value of the gift card without having the physical card.
- d. Unindicted Coconspirator 1 transferred the redemption codes to Defendant. Defendant's role in the conspiracy was to repeatedly use the redemption codes obtained by fraud to purchase goods and additional gift cards from Walmart stores.

Victim 1

4. Victim 1 spoke to a conspirator and was informed that the conspirator posing as a customer support representative needed to remotely take control of Victim 1's computer to fix it. Victim 1 allowed the conspirator to do so. Victim 1 was also informed that it would cost \$1,500.00 to fix the issue, but that the conspirator could credit this amount to Victim 1's bank account. Using the remote access, the conspirator showed Victim 1 what appeared to be Victim 1's online bank account statement and that it had been credited with \$3,000.00. The conspirator informed Victim 1 that they had mistakenly sent Victim 1 an additional \$1,500.00, so Victim 1 needed to purchase gift cards in this amount and to provide the card numbers and redemption codes to the conspirator, which Victim 1 did.

5. A review of records provided by Walmart revealed multiple gift cards were purchased by Victim 1 in Tennessee on January 6, 2021. Within an hour, these gift cards were redeemed by Defendant at a Walmart in Burke, Virginia, which is located in the Eastern District of

Virginia. Defendant executed these transactions using electronic communications between a Walmart located in the Eastern District of Virginia and a data center located outside of Virginia.

Defendant's Use of the Wires in Furtherance of the Scheme

6. Defendant, for the purpose of executing the above-described scheme, caused to be transmitted by means of wire communication in interstate commerce additional writings, signals, pictures, and sounds, including:

Approximate Date	Summary Description
June 11, 2020	Electronic communication between a Walmart located in the Eastern District of Virginia and a data center located outside of Virginia to authorize the purchase of multiple gift cards.
June 14, 2020	Electronic communication between a Walmart located in the Eastern District of Virginia and a data center located outside of Virginia to authorize the purchase of multiple gift cards.
July 9, 2020	Electronic communication between a Walmart located in the Eastern District of Virginia and a data center located outside of Virginia to authorize the purchase of multiple gift cards.
January 1, 2021	Electronic communication between a Walmart located in the Eastern District of Virginia and a data center located outside of Virginia to authorize the purchase of multiple gift cards.
March 22, 2021	Electronic communication between a Walmart located in the Eastern District of Virginia and a data center located outside of Virginia to authorize the purchase of multiple gift cards.

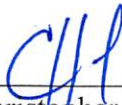
7. This statement of facts includes those facts necessary to support the plea agreement between Defendant and the United States. It does not include each and every fact known to Defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding Defendant's case.

8. The actions of Defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Raj Parekh
Acting United States Attorney

Date: 6/7/2021

By: 
Christopher J. Hood
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, MOULUAN WU, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



MOULUAN WU

I am Gregory English, defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Gregory B. English
Attorney for MOULUAN WU